

EXHIBIT 23

REDACTED

Page 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

- - -

THE STATE OF TEXAS, et al. : Civil Action No.
Plaintiffs, : 4:20-cv-00957-SDJ
vs. :
GOOGLE LLC, :
Defendants. :

- - -

April 19, 2024
HIGHLY CONFIDENTIAL

- - -

Remote Oral Deposition,
taken via Zoom, of [REDACTED],
commencing at 9:01 a.m., on the above
date, before Amanda Maslynsky-Miller,
Court Reporter and Certified Realtime
Reporter.

- - -

Job No. MDLG6658171

1 Q. Do you have Chats going back
2 for 13 years?

3 ATTORNEY PEARL: Objection.
4 Form.

5 THE WITNESS: I have no idea
6 how long that stuff is retained.
7 I mean, I'm not necessarily
8 searching through things that far
9 back, so.

10 BY ATTORNEY CHANG:

11 Q. How about five years?

12 ATTORNEY PEARL: Objection
13 to form.

14 THE WITNESS: Again, I can't
15 tell you the timeline.

16 Most of my usage is pretty
17 recent if I'm searching in a Chat.
18 Because I want, like, a pointer to
19 a piece of code that someone might
20 have sent me in Chat for something
21 relevant to what I'm working on
22 really recently.

23 BY ATTORNEY CHANG:

24 Q. Are all of your Chats

1 reflected in e-mail?

2 A. Are all my Chats
3 reflected -- what?

4 Q. I'll rephrase the question.
5 Do you ever talk about
6 anything in your Chats that -- let me
7 rephrase it again.

8 Are there any conversations
9 that you have via Chat that do not show
10 up in your e-mail?

11 ATTORNEY PEARL: Objection.
12 Form.

13 THE WITNESS: Possibly. I
14 can't tell you for sure. I would
15 be surprised if the topics in the
16 Chat were not reflected in the
17 e-mail.

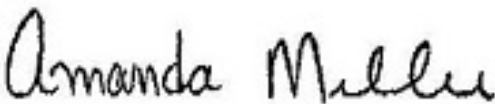
18 But, obviously, the specific
19 conversations I wouldn't repeat in
20 another e-mail, unless I was
21 trying to share those
22 conversations with someone else in
23 an e-mail form. Just kind of
24 normal conversational practice, I

CERTIFICATE

I, Amanda Maslynsky-Miller, Certified Realtime Reporter, do hereby certify that prior to the commencement of the examination, [REDACTED] [REDACTED] was remotely sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



Amanda Miller

Certified Realtime Reporter

Dated: April 22, 2024

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)